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F. MICHAEL DAILY, JR

March 31, 2015

Honorable Joseph Rodriguez, U.S.D.C.J.
Mitchell H. Cohen Building & U.S. Courthouse
4th & Cooper Streets
Camden, NJ 08101

**Re: Nico Electrical Contractor, Inc. And Marshall B. Williams v. City of
Camden, et als
Civil Action No. 1:13-cv-06353**

Dear Judge Rodriguez:

I represent the plaintiff Marshall Williams in the above matter. The defendants have filed a motion for summary judgment and my opposition to same is due April 6, 2015. I have previously requested and received the Clerk's automatic extension.

Unfortunately for the first three weeks of March, I had to divert my attention and efforts to two Chancery matters pending before Judge Batten in Atlantic County. The one matter, in which I represent a physician has been on the docket for over eight years and when I took it over in November the file comprised of nine boxes. In addition, I have also had to devote some time to a brief which will be due shortly in the Third Circuit.

In light of the foregoing, I respectfully request an additional two weeks in which to file my opposition brief. This would make the brief due on April 20, 2015. I have spoken with my adversary Mr. Rybeck and he consents to this request.

Respectfully,

s/ F. Michael Daily, Jr.

F. Michael Daily, Jr.

FMD/ms

cc: Daniel E. Rybeck, Esquire